

Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

August 15, 1989

Mr. Donald Mbamah
Waste Management Division
Michigan Department of Natural Resources
Southeast Michigan Field Office
505 W. Main
Northville, Michigan 48167

Detroit
LDF

Re: Operation and Maintenance Inspection
Ford Allen Park Clay Mine Landfill
MID 980568711

Dear Mr. Mbamah:

Your July 12, 1989 letter concerning the May 23, 1989 Operation and Maintenance (O&M) Inspection conducted by Ms. Jan Sealock and Mr. Terry McNeil of the Geotechnical Support Unit, Waste Management Division, Michigan Department of Natural Resources (MDNR) identifies several recommendations regarding the subject facility. Responses to these recommendations are as follows:

Recommendation: "The facility will need to provide an inventory for each environmental monitoring device including detailed calibrations and maintenance procedures."

Response: The only equipment needed to monitor the wells is a pressure gauge indicator. An annual calibration check of the pressure gauge indicator will be performed according to the manufacturer's instructions included in Attachment 1. At the time of the O&M Inspection the gauge pressure indicator was not zeroing properly and was subsequently shipped to the manufacturer for servicing. The expected ship date for this instrument is August 18, 1989. Maintenance required of this gauge is currently performed by the manufacturer.

Recommendation: "The facility will need to provide a sampling and analysis plan that must be kept with records on-site. The plan should include a written schedule for the inspection of the monitoring well system."

Response: Water sampling and analysis of the wells is no longer required by the facility operating license. Attachment 17-2 of the facility Act 64 operating license outlines the procedure for obtaining static water level elevations of the outfitted artesian wells. The monitoring wells are inspected to ensure that the integrity of the protective casings, caps and

locks are intact pursuant to Attachment 2-4 of the facility operating license. Attachment 2-6 of the operating license provides the inspection schedule (quarterly) of the monitoring wells. The Act 64 operating license is kept on-site.

Recommendation: "Static water elevations should be taken by converting the total inches above the outer protective casing to feet and adding the known USGS outer protective casing elevation of the well. The top of the well's casing has uneven edges causing an unacceptable well survey mark."

Response: Elevations for each well were resurveyed at the north point of the casing and elevations for the north point of each well's outer protective casing were recently surveyed to improve the accuracy of the static water level measurements. Static water level elevations will be determined using the gauge pressure indicator and the surveyed outer protective casing elevation.

Should you have any more questions regarding this matter, please call David O'Connor of this Office at 313/322-0701.

Sincerely,

David S. Miller

Jerome S. Amber *for*
Principal Staff Engineer
Stationary Source Environmental
Control Office

DAO/

Attachment

cc: Jan Sealock

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

June 29, 1989

David A. O'Connor
Environmental Control Engineer
Ford Motor Company
15201 Century Drive
Suite 608
Dearborn, Michigan 48120

RE: MID 980568711

Dear Mr. O'Connor,

On June 20, 1989, an inspection was conducted at your facility located at 15201 Century Drive in Dearborn Michigan. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, I have determined that your facility has no deficiencies with the requirements in the areas reviewed during that inspection.

Thank you for your cooperation during my visit.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donald Mbamah".

Donald Mbamah
Environmental Quality Analyst

DM/dm

Enclosures

cc: B. Okwumabua

Ardys D. Bennett, City of Allen Park

DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT DIVISION
STAFF REPORT

<input type="checkbox"/> COMPLAINT	<input checked="" type="checkbox"/> ACT 64
<input checked="" type="checkbox"/> COMPLIANCE INSPECTION	<input type="checkbox"/> ACT 136
<input type="checkbox"/> PCB REPORT/COMPLAINT	<input type="checkbox"/> RCRA
<input type="checkbox"/> MEETING	<input type="checkbox"/> ACT 245
<input type="checkbox"/> TELEPHONE CALL	<input type="checkbox"/> ACT 641
<input type="checkbox"/> SAMPLING INSPECTION	

COMPANY/FACILITY: FMC, Allen Park Clay Mine
ADDRESS/LOCATION: 17005 Oakwood Blvd., Allen Park, MI.
FACILITY NO: MID 980 568 711
DATE: June 20, 1989
TIME: 1350 Hrs.
PARTICIPANTS: David O'Connor
STAFF: Donald Mbamah, Larry AuBuchon
PAGE 1 OF 1

A brief Act 64 inspection was conducted based on the fact that the facility has not received hazardous waste since 1985 and there is not activity at the site. For the most part solid waste activity has ceased at the facility.

The main areas reviewed include the inspection conducted by the facility, The Contingency Plan, Waste analysis plan, personnel training documents and records, closure and post closure plan, cost estimate for facility closure, financial assurance and financial instrument, operating log, site security plan, the manifest on site which documented site generated waste shipments and a physical site tour.

No deficiencies were noted during this inspection.

RCRA/ACT 64 INSPECTION REPORT

U.S. EPA I.D. Number M 1 D 9 8 0 5 6 8 7 1 1
(or Michigan)

FACILITY NAME
(Mailing Address) FORD MOTOR COMPANY ALLEN PARK CLAY MINE
CHALKWOOD AND SOUTHWELL HWY
ALLEN PARK MICHIGAN
CITY ZIP CODE

DATE 6-20-89 TIME OF INSPECTION (FROM) 1:30 (TO) 3:30

PERSON(S) INTERVIEWED	TITLE	TELEPHONE
<u>DAVID A. O'Connor</u>	<u>ENVIR. CONTROL ENGINEER</u>	

INSPECTOR(S)	AGENCY/TITLE	TELEPHONE
<u>DONALD MBAMAH</u>	<u>MDNR/EPA</u>	<u>344-4670</u>
<u>LARRY AUBUCHON</u>	<u>MDNR/EPA</u>	<u>344-4670</u>

Primary Business of this Facility: LAND DISPOSAL FACILITY

Reason for Inspection:

☒ Routine ☐ Follow-up ☐ Complaint

Based upon the inspection, this facility:

- ☐ is a non-generator/liquid industrial waste generator
- ☐ conditionally exempt small quantity generator
- ☐ small quantity generator
- ☐ generator
- ☐ transporter
- ☒ treatment/storage/disposal facility

FORM

A
A
A
B
C
D

Date of Last Inspection _____

DRAFT

FINANCIAL CAPABILITY

Part 7 R299.9701 to R299.9710.

Note: Facilities not yet issued an operating license in accordance with Part 5 of these rules shall comply with Financial capability, Part 7, of these rules. by July 14, 1989. Rule 701.(2) Federal and State facilities are exempt from financial capability requirements.

Cost estimate for Closure and Post Closure Care Rule 702(1):

40 CFR 264.142 and 264.144

	Violation Class	Yes	No	N/A
1. Is the written closure cost estimate available? 264.142 (2). Note: Indicate the amount:	_____	<input checked="" type="checkbox"/>	_____	_____
2. Is the written post closure cost available? 262.144(a) (Required only for disposal surface impoundment, land treatment, landfill unit or waste pile. Note: Indicate the amount:	_____	<input checked="" type="checkbox"/>	_____	_____
3. Have any revisions been made to the closure/post closure cost estimates which increase the cost of closure/post closure? 264.142(c) and 264.144(c).	_____	<input checked="" type="checkbox"/>	_____	_____
4. Have closure/post closure cost estimates been revised to reflect any increase in costs? 264.142(d) and 264.14(d)	_____	<input checked="" type="checkbox"/>	_____	_____

3-10-89

Violation

Class

Yes

No

N/A

5. Have closure/post closure cost estimates for facilities using financial test or corporate guarantee been revised within 30 days after close of firms fiscal year? 264.142(b) and 264.144(b)

Call company & find out when

6. For all other financial instruments have closure/post closure cost estimates for facilities been revised within 60 days of their anniversary date of establishment? 264.142(b) and 264.144(b)

7. Have the closure/post closure cost estimates been adjusted by either recalculating cost estimates or using the most recent appropriate inflation factor? 264.142(b) 264.144(b)

looks like it
*Call **

Comments:

Financial Assurance for Closure/Post Closure Care Rule 703

8. Indicate which of the following financial mechanism(s) are used to establish financial assurance for closure/post closure care Rule 703(1). Also, indicate if its for closure/post closure care Rule 7063 (1).

_____ Trust fund Rule 704

_____ Surety bond guaranteeing performance of closure/post closure care. Rule 705

_____ Letter of Credit, Rule 706.

Violation

Class

Yes

No

N/A

_____ Certificate of Deposit or Time Deposit
account. Rule 707

_____ Closure post/closure insurance Rule 708

_____ ✓ Financial test and corporate guarantee for
closure/post closure Rule 709.

9. If multiple mechanisms are used are they limited to trusts, surety bonds, letters of credit certificates of deposits and insurance? Rule 703(2)
10. Are financial assurance mechanisms used for more than one facility? Rule 703(3). If you indicate their names and ID number.

Comments: _____

FINANCIAL MECHANISMS

11. Trust fund. Rule 704
- A. Is trust agreement on DNR approved form? Rule 704(1)
- B. Is trust funded at 100% closure/post closure cost. Rule 704(2).
- If no, indicate amount. _____

12. Surety Bond Guarantee. Rule 705
- A. Is bond executed on DNR approved form? Rule 705(1)

		Violation Class	Yes	No	N/A
12.	B. Is sum of bond equal or greater than closure/post closure costs? Rule 706 (4). If no, indicate amount.	_____	_____	_____	_____
13.	Letter of Credit Rule 706				
	A. Is letter of credit executed on a form approved by Director. Rule 706(1)	_____	_____	_____	_____
	B. Is letter of credit accompanied by a letter from owner/operator providing the following: EPA ID number; name and address of facility; amount of funds assured for closure/post closure? Rule 706(3)	_____	_____	_____	_____
	C. Is letter of credit equal to or greater than closure/post closure costs? Rule 706(3). If no, indicate amount.	_____	_____	_____	_____
14.	Certificate of deposit/time deposit. Rule 707				
	A. Is certificate or account in only name of the director? Rule 707(2)	_____	_____	_____	_____
	B. Is there an agreement which identifies reasons which director may cash the certificate or account on a DNR approved form? Rule 707(3)	_____	_____	_____	_____
	C. Is certificate for amount equal to closure/post closure cost estimates. Rule 707(4). If no, indicate amount.	_____	_____	_____	_____

	Violation Class	Yes	No	N/A
15. Closure/post closure insurance. Rule 708.				
A. Does certificate use wording approved by director; or				
B. A certified true and complete copy of the policy. Rule 708(1)				
C. Is the closure/post closure insurance policy issued for face amount at least equal to current closure/post closure cost estimate? Rule 708(4). If no, indicate amount.				

16. If using multiple assurance mechanisms, do they equal or exceed closure/post closure cost estimates? Rule 703(2).

Indicate total.

Comments:

17. Financial test and corporate guarantee. Rule 709. For financial test does the owner operator meet A or B? Rule 709(1)

- A. Two of the following three ratios:

1. Ratio of liabilities to net worth less than 2.
2. A ratio of sum of net income plus depreciation depletion and amortization to total liabilities of more than 0.1.

	Violation Class	Yes	No	N/A
3. A ratio of current assets to liabilities of more than 1.5. and:	_____	<input checked="" type="checkbox"/>	_____	_____
4. Net working capital and tangible net worth each not less than 6 times the sum of closure and post/closure cost estimates.	_____	<input checked="" type="checkbox"/>	_____	_____
5. Tangible net worth not less than \$10,000,000 and:	_____	<input checked="" type="checkbox"/>	_____	_____
6. Assets in the U.S. not less than 90% of total assets or not less than 6 times the closure/post closure costs and:	_____	<input checked="" type="checkbox"/>	_____	_____
7. Total assets in Michigan not less than \$50,000,000	_____	<input checked="" type="checkbox"/>	_____	_____

Comments: _____

or all of the following:

- B.
- | | | | | |
|--|-------|-------------------------------------|-------|-------|
| 1. An acceptable Standard and Poors or Moody's Rating for the most recent bond issuance. | _____ | <input checked="" type="checkbox"/> | _____ | _____ |
| 2. Tangible net worth not less than 6 times the sum of closure/post closure cost estimates. | _____ | <input checked="" type="checkbox"/> | _____ | _____ |
| 3. Tangible net worth not less than \$10,000,000 | _____ | <input checked="" type="checkbox"/> | _____ | _____ |
| 4. Assets in the U.S. not less than 90% of total assets or not less than 6 times closure/post closure costs. | _____ | <input checked="" type="checkbox"/> | _____ | _____ |

	Violation Class	Yes	No	N/A
5. Total assets in Michigan at least \$50,000,000		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: _____

18. For financial test and corporate
guarantee has the owner operator:
Rule 709(3)

A. Have a letter signed by
chief financial officer
and worded as specified by
director.

B. A copy of independent CPA
report examining owner
operators financial
statement.

C. A copy of special report
by independent CPA stating:

1. The Independent CPA
compared data from chief
financial officer which
specifies having derived
from the independent audit-
year-end financial state-
ment; and

2. No matters came to their
attention indicating the
information needs
adjustments.

19. Corporate guarantee. Rule 709.10
Does owner meet requirements of
17 and 18 above; and:

A. Use wording identical to
wording provided by
Director.

	Violation Class	Yes	No	N/A
B. Does terms of corporate guarantee include:				
1. Appropriate provisions of owner/operator facts to perform final closure		<input checked="" type="checkbox"/>		
2. Appropriate cancellation provisions.				
3. Alternate financial assurance provisions.		<input checked="" type="checkbox"/>		
Comments:				

Liability Requirements Rule 710

- | | | | | |
|--|--|-------------------------------------|--|--|
| 19. Does owner/operator maintain liability coverage for sudden and accidental occurrences not less than \$1,000,000 per occurrence with an annual aggregate not less than \$2,000,000? Rule 710(1) | | <input checked="" type="checkbox"/> | | |
| 20. For surface impoundment landfill or land treatment does owner/operator maintain liability coverage for sudden accidental occurrences not less than \$3,000,000 per occurrence with an annual aggregate of not less than \$6,000,000? Rule 701(2) | | <input checked="" type="checkbox"/> | | |
| 21. For the required insurance policy(s) is each policy amended by attachment of an endorsement on a form provided by the Director? and | | | | |

Violation

Class

Yes

No

N/A

22. Is insurer licensed to
transact business in
Michigan?

Comments:

Also RCLA
- LR - No waste capacity
been accepted.

State of Michigan
Department of Natural Resources

HAZARDOUS WASTE FACILITY
OPERATING LICENSE

Name of Licensee: Ford Motor Company

Name of Owner: Ford Motor Company

Name of Operator: Ford Motor Company

Name of Titleholder of Land: Ford Motor Company

Facility Name: Ford Motor Company, Allen Park Clay Mine

Facility Location: 17005 Oakwood Boulevard, Allen Park, Michigan

EPA Identification Number: MID 980 568 711

Effective Date: May 8, 1989

Expiration Date: May 8, 1994

Authorized Activities

Pursuant to the Hazardous Waste Management Act, 1979 P.A. 64, as amended, and rules promulgated thereunder by the Michigan Department of Natural Resources (MDNR), an operating license is issued to (hereafter called the licensee) to operate a hazardous waste facility located in Allen Park, Michigan, at latitude 42°17'00"N and longitude 83°12'21"W. You are authorized to conduct the following hazardous waste management activities:

<input type="checkbox"/> Storage	<input type="checkbox"/> Treatment	<input checked="" type="checkbox"/> Disposal
<input type="checkbox"/> Container	<input type="checkbox"/> Tank	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Tank	<input type="checkbox"/> Surface Impoundment	<input checked="" type="checkbox"/> Landfill
<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Land Application
<input type="checkbox"/> Surface	<input type="checkbox"/> Other	<input type="checkbox"/> Surface
<input type="checkbox"/> Impoundment		<input type="checkbox"/> Impoundment

Applicable Regulations:

The conditions of this license were developed in accordance with the applicable provisions of the September 6, 1985 rules under 1979 PA 64:

<input checked="" type="checkbox"/> Part 2	<input type="checkbox"/> R 299.9614	<input type="checkbox"/> R 299.9623 to R 299.9625
<input type="checkbox"/> Part 3	<input type="checkbox"/> R 299.9615	<input type="checkbox"/> R 299.9626
<input checked="" type="checkbox"/> R 299.9601 to	<input type="checkbox"/> R 299.9616	<input checked="" type="checkbox"/> Part 7
R 299.9611	<input type="checkbox"/> R 299.9617	<input type="checkbox"/> Part 8
R 299.9612	<input type="checkbox"/> R 299.9618	
<input checked="" type="checkbox"/> R 299.9613	<input checked="" type="checkbox"/> R 299.9619 to	
	R 299.9622	

RECEIVED
MAY 15 1989
WASTE MANAGEMENT DIV.

License Approval:

The licensee shall comply with all terms and conditions of this license. This license consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in R 299.9101 through R 299.11008 as specified in the license. Applicable rules are those which are in effect on the date of issuance of this permit.

This license is based on the information in the operating license application submitted on April 21, 1986 and any subsequent amendments (hereafter referred to as the application). The facility shall be constructed and/or operated as specified in the application. Any inaccuracies found in this information provides grounds for the revocation or modification of this license [see R 299.9519(6)] and enforcement action. The licensee shall inform the Director of any deviation from or changes in the information in the application which would affect the licensee's ability to comply with the applicable rules or license conditions.

This license is effective as of May 8, 1989, and shall remain in effect until May 8, 1994, unless revoked (R 299.9519) or continued in effect as provided by 1969 PA 306, as amended, the Michigan Administrative Procedures Act.

Issued this 8th day of May, 1989.

by


David F. Hales, Director

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MAY 15 1989

WASTE MANAGEMENT DIV.

PART I
STANDARD CONDITIONS

A. TERMINOLOGY

Throughout this license, "Act 64" means 1979 PA 64, as amended, and "rules" means the administrative rules for 1979 PA 64, as amended. The term "Waste Management Division" means the division within the Michigan Department of Natural Resources responsible for administering 1979 PA 64, as amended, and its rules.

B. EFFECT OF LICENSE

Any treatment, storage or disposal of hazardous waste not specifically authorized in this license is prohibited. Issuance of this license does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of federal, State or local law or regulations; nor does it obviate the necessity of obtaining such permits or approvals from other units of government as may be required by law. Compliance with the terms of this license does not constitute a defense to any order issued or any action brought under Act 64, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606(a), commonly known as CERCLA) as amended by Superfund Amendments and Reauthorization Act of 1986 (42 U.S.C. 9601, commonly known as SARA) or any other statutory or common law authorities providing for protection of public health or welfare or the environment. Each attachment to this license is a part of, and is incorporated into, this license and shall be considered an enforceable part of the license.

C. LICENSE ACTIONS

The filing of a request for a license modification, revocation or the notification of planned changes or anticipated noncompliance on the part of the licensee does not stay the applicability or enforceability of any license condition.

D. SEVERABILITY

The provisions of this license are severable, and if any provision of this license, or the application of any provision of this license to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this license shall not be affected thereby.

RECEIVED

E. DUTIES AND REQUIREMENTS

MAY 15 1989

1. Duty to Comply.

WASTE MANAGEMENT DIV.

- (a) The licensee shall comply with Act 64, its rules and all conditions of this license.

(b) Any license noncompliance constitutes a violation of Act 64 and is grounds for enforcement action, license revocation, license modification, and denial of a license renewal application.

2. Duty to Reapply. If the licensee wishes to continue an activity allowed by this license after the expiration date of this license, the licensee shall submit a complete application for a new license to the Chief of the Waste Management Division at least 180 days before this license expires.
3. License Expiration. To the extent consistent with Section 91(2) of the Michigan Administrative Procedures Act, MCL 24.291(2), this license and all conditions herein will remain in effect beyond the license's expiration date if the licensee has submitted a timely, complete application and through no fault of the licensee, the Director has not issued a new license.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the licensee in an enforcement action that it would have been necessary to halt or reduce the licensed activity in order to maintain compliance with the conditions of this license.
5. Duty to Mitigate. The licensee shall take all steps necessary to prevent and correct any adverse impact on the environment or human health or welfare resulting from or that may result from noncompliance with any condition in this license.
6. Proper Operation and Maintenance. The licensee shall at all times properly operate and maintain all facilities and related appurtenances which are installed or used by the licensee to achieve compliance with the conditions of this license. Proper operation and maintenance includes: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls (including appropriate quality assurance procedures). This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the license.
7. Duty to Provide Information. The licensee shall furnish to the Director or any authorized representative, including, but not limited to, a contractor, within a reasonable time, any information which the Director or the authorized representative may request to determine whether cause exists for an enforcement action, license revocation, license modification, denial of a license renewal application, or to determine compliance with this license. The licensee shall also furnish to the Director or any authorized representative, upon request, copies of any record required to be kept by this license.
8. Inspection and Entry. The licensee shall allow the Director, or any authorized representative, or contractor, upon the

presentation of credentials and other documents as may be required by law to:

- (a) Enter at reasonable times upon the licensee's facility and any other locations where records are required to be kept under the conditions of this license;
- (b) Have access to and receive copies of, at reasonable times, any record required to be kept under the conditions of this license;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this license; and
- (d) Sample or monitor, at reasonable times, any substances or parameters at any location for the purpose of determining whether cause exists for an enforcement action, license revocation, license modification, denial of a license renewal application, or to determine compliance with this license. If samples are taken for analysis, duplicate samples and a duplicate of the analytical results shall be furnished to the licensee upon request.

9. Monitoring and Records.

- (a) Samples and measurements taken by the licensee for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods used by the licensee must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 (1986) or an equivalent method included in any attachment to this license. Alternate methods for obtaining a representative sample or for alternate test methods may be used if approved in writing by the Director.
- (b) The Director reserves authority to require specific monitoring for hazardous wastes or hazardous waste constituents in addition to those requirements detailed in this license if the Director finds that additional monitoring is needed to demonstrate compliance with this license, Act 64, its rules and any other applicable laws and rules.
- (c) The licensee shall submit the results of all environmental monitoring required by this license to the Chief of the Waste Management Division within 60 days of sample collection or within 7 days of receipt of the analytical results, whichever is sooner.

- (d) The licensee shall provide environmental monitoring information or data which it generates to any person requesting such information or data. Such information or data shall be made available on the same day the licensee forwards this information to the Chief of the Waste Management Division.
- (e) If the licensee conducts any additional environmental sampling or analysis beyond that required by this license, the results of such sampling or analysis shall be reported in accordance with Condition I.E.9(c) of this license. Such increased frequency shall also be indicated in the report.
- (f) The licensee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this license, and records of all data used to complete the application for this license for a period of at least ~~three~~ years from the date of the sample, measurement, report or record. This period may be extended by the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility.

- (e) If the licensee conducts any additional environmental sampling or analysis beyond that required by this license, the results of such sampling or analysis shall be reported in accordance with Condition I.E.9(c) of this license. Such increased frequency shall also be indicated in the report.

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- (f) The licensee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this license, and records of all data used to complete the application for this license for a period of at least ~~three~~ years from the date of the sample, measurement, report or record. This period may be extended by the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility.

① Provide record of monitoring info.

1	2
---	---

- (g) Records of monitoring information shall specify:

- (i) The dates, exact place, and times of sampling or measurements;

- (ii) The individuals who performed the sampling or measurements;

- (iii) The dates analyses were performed;

- (iv) The analytical techniques or methods used; and

- (v) The results of such analyses

ARE THESE INFO
SPECIFIED IN THE MONTH. INFO. (ii)

Has any modification been made to the facility ☐ ☒

10. Facility Modifications. The licensee shall give notice to the Chief of the Waste Management Division as soon as possible prior to any physical modifications to the licensed facility. In accordance with R 299.9519, the licensee shall request and obtain a license amendment prior to undertaking any modifications to the facility. The licensee shall obtain a construction permit prior to expanding, enlarging or altering the facility.

Has the Chief Notified ☐ ☒

Pg 23
WMS

2.
Pg 23
Ly Simke

A SUCH
NOTICE

11. Anticipated Noncompliance. The licensee shall give advance notice to the Chief of the Waste Management Division of any changes or activity in the licensed facility which may result in noncompliance with license requirements.

Consent to sell it
as approval obtained

R 299.9522, the
Director by a
insuring ownership or
son. In addition, the
nts of R 299.9605 when
ty. The new
is waste at the facility
n issued by the

reported any non compliance

ort to the Director any
ch may endanger human
The licensee shall
by immediately con-
agement Division if the
eriod 8:00 a.m. to
except State holidays,
atural Resources
am (PEAS) telephone
other times. This report

Contains the following

release or discharge of
rdous waste constituent
inking water supplies or

release or discharge of
rdous waste constituent,
t the facility, which
ent or human health or

ence and its cause

Telephone number of the owner

Telephone number of the

of incident;

materials involved;

es, if any;

ual or potential hazard to
human health where this is

tity and disposition of recovered
resulted from the incident.

Written Report
follow-up the verbal report by
rt to the Chief of the Waste
in five (5) days of the time the
f the circumstances. The written

of the information in condition
th a description of the
use; the periods of noncompliance
nd times); whether the
orrected; and if not, the
xpected to continue; and steps
ce, eliminate, and prevent
pliance and when those activities

The licensee need not comply with
notice requirement if the Chief
Division waives the requirement
a written report containing this
en (15) days of the time the
f the circumstances.

ensee shall report all other
t otherwise required to be report-
ing reports required by this
in 30 days, whichever is sooner.
information listed in
ense.

the licensee becomes aware that
elevant facts in the license
orrect information in a license
to the Director, the licensee
cts or information.

The licensee shall notify any
ion, tunneling, and discharging of
uildings which may affect the
dance with Act 53 of the Public
460.718, and comply with each of

BY Director, is he a responsible
corporate officer
reports required by this license
the Director are signed by a
responsible corporate officer
surer, or vice president of the
al business function, or any other
or decision making functions for
one or more manufacturing,
employing more than 250 persons
penditures exceeding \$25 million,
been assigned or delegated to the

Jelly Ambe
(Principal Staff Eng.)

(Some letter has
not been sent
out but has
any been
no problem)

manager in accordance with corporate procedures, or by a duly authorized representative of that person. A person is a duly authorized representative if:

DOES AUTHORIZED SIGNATORY have the following

1. The authorization is made in writing by a principal executive officer of at least the level of vice president;
2. The authorization specifies either an individual or a position having responsibility for overall operation of the regulated facility or activity; and
3. The written authorization is submitted to the Director.

G. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

The licensee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments required by this license:

ARE THE FOLLOWING DOCS MAINTAINED AT THE FACILITY

- ✓ 1. Waste analysis plan.
- ✓ 2. Inspection schedules.
- ✓ 3. Personnel training documents and records.
- ✓ 4. Contingency plan.
- ✓ 5. Closure and post-closure plan.
- ✓ 6. Cost estimate for facility closure. —, Rep. send copy
- ✓ 7. Up-to-date closure and post-closure financial assurance instrument(s).
- ✓ 8. Operating log.
- ✓ 9. Site security plan.
- ✓ 10. Facility engineering plans and specifications.
11. Recordkeeping procedures.
12. Up-to-date liability insurance instrument or financial test.
13. Environmental Monitoring Program - sampling and analysis plans.
14. Environmental monitoring data and statistical records.

after refer to
closure
—, Rep. send copy

(17-1)

Part II

General Facility Condition

A. Design and operation of the facility

1. Does the Ford Motor Company maintain its facility to minimize the possibility of:

Fire, explosion, or any sudden or non-sudden release of any hazardous waste constituents to the environment, including air, soil, or waters of the state that could threaten human health, welfare or the environment

Yes / No

/	
---	--

Comment _____

Required Notices

- B 1. Does FMC Allen Parks receive waste from foreign Country.

	/
--	---

IF no go to B.3

2. Did the licensee notify the director four(4) weeks in advance of the date the waste was expected to arrive. (notice of subsequent shipment from the same source and the same waste is not required)

--	--

3. Does FMC Allen Park receive hazardous waste from an offsite source (except where the licensee is also the generator)

	/
--	---

If no go to ...

4. Has FMC Allen Park informed the generator in writing that he has the appropriate license for and will accept, the waste the generator is shipping.

--	--

** This information must be a part of the operating log.

General Waste Analysis

- C. Does the licensee follow the procedure described in the waste analysis plan. (Attachment 1)

Refer to checklist

/	
---	--

Security

- D. Does the licensee comply with security requirement of Act 64 and its rules. Refer to checklist

/	
---	--

General Inspection Requirements

- E .1 Does the licensee follow the inspection schedule in attachment 2 of this license.

--	--

- 2 Has the licensee remedies problem found in this inspections to ensure that these does not threaten human health or welfare or the environment.

/	
---	--

- 3 Has the remedial action been taken immediately in case of imminent or hazard that has already occurred.

/	
---	--

- | | |
|--|--|
| | |
|--|--|
- 4 Has full remedial action taken in a reasonable time and are the record kept on file for three years.
- | | |
|---|--|
| / | |
|---|--|

- 5 Does the record include the following:

- Date and time of inspection
- The name of the operator
- A notation of the observation made
- Date and nature of any repairs or other remedial action

/	
/	
/	
/	

Personnel Training

- ✓ F .1 Has FMC allen park conducted personnel training as required by Act 64 and its rules and did the program follow tha attached outlines, attachment 3 of this license.

Use checklist

/	
---	--

Prepardness And Prevention

- G Refer to checklist (inspection form D)

Contingency Plan

- H Refer to checklist (inspection form D)

Manifest System

- I Refer to checklist (inspection form D)

RecordKeeping and Reporting

- J 1. Operating Log(record)
2. Biennial Report

Closure

- K 1.

1. The licensee shall provide and continuously maintain a closure financial assurance instrument approved by the Director in at least the amount of the cost estimate required by Condition II.L. of this license. The licensee shall submit all proposed changes in financial assurance instruments to the Director and obtain his approval prior to implementation. In addition, the licensee shall maintain copies at the facility and make these documents available for inspection upon request from a Department representative.
2. The licensee shall provide the Chief of the Waste Management Division with a signed original of an approved renewal or replacement closure financial assurance instrument 60 days prior to the expiration date of the current instrument. Failure to provide such documentation is a violation of this license and shall be cause for the Director to access all funds provided in any financial instrument not renewed in accordance with this condition and to initiate revocation of this license.

O. LIABILITY REQUIREMENTS

The licensee shall continuously maintain liability coverage for sudden and accidental occurrences and nonsudden accidental occurrences as required by R 299.9710 except as otherwise allowed by that rule.

P. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

1. The licensee shall notify the Director by certified mail of the commencement of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming the licensee as debtor, within 10 days after commencement of the proceeding.
2. A licensee who fulfills the requirements of Act 64 and its rules by obtaining a trust fund, surety bond, letter of credit, certificate of deposit, or insurance policy shall be deemed to be without the required financial assurance or liability coverage in the event of bankruptcy of the trustee or issuing institution, or a suspension or revocation of the authority of the trustee institution to act as trustee or of the institution issuing the surety bond, letter of credit, certificate of deposit, or insurance policy to issue such instruments. The licensee shall establish other financial assurance or liability coverage within 60 days after such an event.

Specific Regs

Location of the hazardous waste landfill within the area bounded by I-94, Oakwood Boulevard, M-39, and Outer Drive are covered by this license.

Has there been any expansion beyond the covered location or in the landfill design capacity of 646 acre-feet

If no go to

Did the FMC Allen Park get construction permit from the Director.

NOTE:

The engineering plan for the license is dated July 6, 1988, (Attachment 7)

B. Acceptable Waste Types

Has the facility accepted waste other than

- K061 - Electric furnace emission control dust
- k087 - Decanter tank tar sludge from coking operations
- F006 - Wastewater treatment sludge from coking operations
- D004 - EP Toxic - Arsenic
- D005 - EP Toxic - Barium
- D006 - EP Toxic - Cadmium
- D007 - EP Toxic - Chromium
- D008 - EP Toxic - Lead
- D009 - EP Toxic - Mercury
- D010 - EP Toxic - Selenium
- D011 - EP Toxic - Silver
- 001D - EP Toxic - Copper
- 003D - EP Toxic - Zinc

Yes No /

	/
--	---

If yes list _____

Exempt for Appendix

No has was past 6 months

Has FMC Allen Park received any solid waste, including free liquids and containers holding free liquids including lab packs, exhibiting the characteristics of ignitable (D001), Corrosive (D002), or Reactivity (D003).

NOTE: The above shall not be accepted for disposal by this

facility.

--	--

Does FMC accept waste which will do the following:

- Adversely affect the permeability of the clay liner.

	<input checked="" type="checkbox"/>
--	-------------------------------------

- Produce a leakage which is incompatible with the synthetic liner, leachate collection system, discharge piping and off-site sewer system.

--	--

	<input checked="" type="checkbox"/>
--	-------------------------------------

- Generate gases which will adversely effect the permeability of the clay cap.

--	--

	<input checked="" type="checkbox"/>
--	-------------------------------------

- Create a violation of the 1975 P.A. (Clean air Act) and rules promulgated thereunder.

	<input checked="" type="checkbox"/>
--	-------------------------------------

- Waste which are banned from land disposal by Act 641, 64 and RCRA as amended.

--	--

Unless a variance is obtained from this ban by a regional administrator of EPA.

- If Land Ban waste, has FMC submitted a revised Waste analysis Plan to the Chief of the Waste Management Division which describes the procedure to be used to ensure that these waste are not landfilled.

--	--

Note: The plan should be submitted for approval 60 days prior to the effective date of such rules. If the effective date less than 60 days from the promulgated date, the licensee should submit the revised plan no more than 60 days upon which such rules are finalized.

- Are all waste coming and being accepted placed in closed container or otherwise totally contained or covered during transportation.

<input checked="" type="checkbox"/>	
-------------------------------------	--

C Landfill Construction and Design Specifications

To be done prior to constructing cell 2 shall do the following.

D. Run-on, Runoff, And Contaminant Control.

- Did the licensee
Construct, Operate and maintain a run-on control system
capable of preventing flow to the active portion of the
facility during peak discharge from at least a 24 hour,
25-year storm. _____

- Divert runoff from non-active portions of the site to
drainage ditches as specified on the engineering plans
(Attach. 7) _____

- - Collect and control the water volume resulting from
active section of the facility from at least a 24-hour,
100-year storm. Note: This runoff shall be discharged in
accordance with the federal clean water Act and 1929 PA
245. _____

Does the licensee require:

- That all waste delivery truck traffic within the active
cell be on a pavement or clean Daily-cover to ensure that
the contaminant are not carried out of the cell to the
haul road. _____

Does the licensee operate and maintain a vehicle wash
facility _____

If yes...

Does the licensee ensure that vehicles traveling on active
portion of the site cleaned and decontaminated at the
facility before leaving the activity area. _____

Waste Placement

Does the licensee:

- Only place waste in the portion of cell 2 for which
certification has been approved by a registered
professional engineer. _____

- Assure that the containers are at least 90% full when placed in a landfill, or crushed, shredded or simply reduced in volume to the maximum practical extent before burial in a landfill. If crushed in a landfill site, containers shall be crushed only in a landfill cell which is fully certified by a registered professional engineer.
-
- Record the contents, quantity, and location of each daily waste deposit in the operating log. NOTE: This information shall be recorded on a map or diagram of each cell of disposal area and shall include cross reference

to specific manifest document numbers. _____

F Environment And Human Health Standards

Does the licensee operate the facility in a manner that will prevent all of the following:

- Danger to human health, welfare or the environment.
- Violation of the Federal clean water Act as amended and Michigan water resource commission Act.
- Air emission in violation of Federal clean air Act, as amended, the Michigan Air Pollution Act.
- Exposure of humans or the environment to harmful quantity of hazardous waste or hazardous waste constituents.
- Pollution, impairment or destruction of the natural resources of the state.

Does the licensee place at least 15 cms of clean soil or other material approved by the Chief of Waste Management Division over the waste at the end of each working day.

Does the licensee effectively

- Control Fugitive dust emission, in the manner approved by the Chief of Waste Management Division. _____
- Control all paved roads and make sure they are cleaned

14 (F3)

ask Peter B. Kalarickal (SINCA 20) (ask him about)

at least once during the days operation by a mechanical vacuum sweeper or other means approved by the Chief of waste Management Division.

Talk to PETB
Quartermaster
& Doc Watson

Did this last in
December

PART IV

ENVIRONMENTAL MONITORING

A. POTENTIOMETRIC MONITORING PROGRAM

1. The licensee shall maintain and operate a potentiometric monitoring program for groundwater consisting of groundwater wells 2D, 5D, 10D, 102D, 103D, 104D, and 105D located as shown on Figure 1-G of Attachment 17 of this license.
 - a. The static water elevation shall be determined by methods giving precision to 1/8 inch or 0.01 foot. Measurements shall be related to a permanent reference point, using United States Geological Survey datum.
 - b. All wells shall be clearly labeled, securely capped, and locked when not in use.
 - c. Prior to undertaking well replacement or repair, the licensee shall obtain the approval of the Chief of the Waste Management Division.
2. The licensee shall determine the groundwater flow direction in the aquifer at least annually, and develop a potentiometric contour map from this data. This information must be submitted to the Chief of the Waste Management Division within 30 days of the monitoring event.

B. LEACHATE MONITORING

(starting June)

1. The licensee shall monitor the volume of leachate pumped from each active and closed cell at the facility. The volume of leachate pumped from each cell per month shall be recorded in the operating log.
2. The licensee shall monitor the quality of leachate pumped from each active and closed cell. This must be accomplished by obtaining representative samples from each cell and analyzing them individually. The licensee shall do all of the following:
 - a. Sample and analyze quarterly for those parameters listed in Tables 1, 2 and 6 of Attachment 10.
 - b. Submit an annual leachate summary report to the Chief of the Waste Management Division no later than March 1st of each year. The report must include analytical results and leachate volumes pumped from each cell during the previous calendar year. This reporting shall be in addition to the requirements of Condition I.E.9.c. of this license.
3. The licensee shall use the sampling and analysis procedures specified in Attachment 10 of this license.

C. LEAK DETECTION, COLLECTION AND REMOVAL SYSTEM MONITORING

1. The licensee shall withdraw liquid which has collected in the leak detection, collection and removal system for Cell 2 at least monthly, and shall record the volume of liquid withdrawn.
2. The licensee shall sample and analyze the leak detection, collection and removal system as follows:
 - a. As Cell 2 is constructed, the licensee shall, at least monthly, if liquid is present, sample and analyze the leak detection, collection and removal system for all parameters listed in Tables 1, 2 and 6 of Attachment 11, prior to waste being placed in the cell to establish background concentrations of these parameters. If no liquid is present, background shall be established by the continuity correction method based on the detection limit of the compound for purposes of the statistical test outlined in condition C.3. of this part.
 - b. After waste has been placed in a cell, the licensee shall sample and analyze each withdrawal from the system for those parameters listed in Tables 1, 2 and 6 of Attachment 11 and any additional volatile constituents found in the leachate of that cell in concentrations exceeding 0.5 ppm during two consecutive samplings conducted pursuant to condition B.2. of this part. The statistical procedure outlined in condition C.3. of this part shall be performed on all analytical results.
3. The licensee shall determine if statistically significant increases of each parameter analyzed have occurred above the background levels established pursuant to condition C.2. of this part. A statistically significant increase shall be determined using the interim statistical test specified in Attachment 12, Part B. A final statistical program shall be developed in accordance with Condition I of this part.
 - a. If a statistically significant increase is detected the licensee shall immediately notify the Waste Management Division and arrange a resampling as soon as possible to confirm if a statistically significant increase exists.
4. If a statistically significant increase is confirmed by a resampling of the leak detection system, the licensee shall do all of the following:
 - a. Notify the Director immediately by calling the Chief of the Waste Management Division, the Waste Management Division District Supervisor, or Department of Natural Resources 24 hour emergency response telephone at 1-800-292-4780, and by providing followup notification to the Chief of the Waste Management Division in writing within 7 days.

- b. Immediately test all shallow monitoring wells within 1,000 feet of Cell 2.
 - c. Begin immediate action to implement the current contingency plan.
 - d. Within 30 days, determine the cause of contamination and whether failure has occurred in the liner system.
 - e. Provide the Chief of the Waste Management Division, or his or her designee, with weekly telephone updates and written reports every two weeks regarding the progress to date in determining the cause of contamination, and the results of all samples from environmental monitoring conducted by the licensee.
5. If the determinations made under condition C.3. of this part indicate an escape of pollutants from Cell 2, the licensee shall do either of the following:

- a. Begin immediate action to repair failures in the liner system or otherwise correct the problem and demonstrate to the Chief of the Waste Management Division within 72 hours that the action being taken will correct the escape of pollutants. The licensee shall complete the repair on a schedule approved by the Chief of the Waste Management Division, and shall obtain the certification of a registered professional engineer that, to the best of his or her knowledge or opinion, the failure has been corrected. If the Chief of the Waste Management Division determines that the failure cannot be corrected on a schedule which insures the protection of human health and the environment, the licensee shall comply with condition C.5.b. of this part.
- b. Cease placing waste into Cell 2 and take action to prevent the migration of hazardous waste and hazardous waste constituents from Cell 2 on a schedule approved by the Chief of the Waste Management Division.

D. LYSIMETER MONITORING FOR LEAK DETECTION

- Make sure it gets approved*
- 1. The licensee shall submit a program for design and installation of two or more leak detection lysimeters around Cell 1 within 30 days of issuance of this license to the Chief of the Waste Management Division for approval. This program must include a schedule for installation and initial sampling.
 - 2. The licensee shall sample quarterly and analyze the leak detection lysimeters for all parameters listed in Table 2 of Attachment 11 as follows:
 - a. If no liquid is present, background shall be assumed to be one-half the method detection limit of the compound for

purposes of the statistical test outlined in condition D.3. of this part.

- b. The licensee shall sample and analyze each withdrawal from each lysimeter for those parameters listed in Table 2 of Attachment 11 and any additional volatile constituents found in the leachate of that cell in concentrations exceeding 0.5 ppm during two consecutive samplings conducted pursuant to condition B.2. of this part.
3. The licensee shall determine if statistically significant increases of each parameter analyzed have occurred above the background levels established pursuant to condition C.2. of this part. A statistically significant increase shall be determined using the interim statistical test specified in Attachment 12, Part B. A final statistical program shall be developed in accordance with Condition I of this part.
 - a. If a statistically significant increase is detected, the licensee shall immediately notify the Waste Management Division and arrange a resampling as soon as possible to confirm if a statistically significant increase exists.
4. If a statistically significant increase is confirmed by a resampling of the lysimeter system, the licensee shall do all of the following:
 - a. Notify the Director immediately by calling the Chief of the Waste Management Division, the Waste Management Division District Supervisor, or Department of Natural Resources 24-hour emergency response telephone at 1-800-292-4780, and by providing followup notification to the Chief of the Waste Management Division in writing within 7 days.
 - b. Immediately test the surface water and all shallow monitoring wells within 1,000 feet of Cell 1.
 - c. Begin immediate action to implement the current contingency plan.
 - d. Within 30 days, determine the cause of contamination and whether failure has occurred in the liner system.
 - e. Provide the Chief of the Waste Management Division, or his or her designee, with weekly telephone updates and written reports every two weeks regarding the progress to date in determining the cause of contamination, and the results of all samples from environmental monitoring conducted by the licensee.
5. If the determinations made under condition D.2. of this part indicate an escape of pollutants from Cell 1, the licensee shall do either of the following:

- a. Begin immediate action to repair failures in the liner system or otherwise correct the problem and demonstrate to the Chief of the Waste Management Division within 72 hours that the action being taken will correct the escape of pollutants. The licensee shall complete the repair on a schedule approved by the Chief of the Waste Management Division, and shall obtain the certification of a registered professional engineer that, to the best of his or her knowledge or opinion, the failure has been corrected. If the Chief of the Waste Management Division determines that the failure cannot be corrected on a schedule which insures the protection of human health and the environment, the licensee shall comply with condition D.5.b. of this part.

- b. Take action to prevent the migration of hazardous waste and hazardous waste constituents from Cell 1 on a schedule approved by the Chief of the Waste Management Division.

How will E.S. be
Sec. will be every 24 hrs when instructed & reviewed
Will get (How to record)
SURFACE WATER MONITORING

1. The licensee shall conduct a surface water monitoring program of surface water drainage from the site by collecting samples once each quarter after a 24-hour, 0.5 inch or greater rainfall, from those locations shown on Figure 1-A of Attachment 13. The licensee shall analyze each sample for those constituents listed in Tables 1, 2, and 3 of Attachment 13, using the procedures specified in Attachment 13, and Appendix 1 of Attachment 10. The licensee shall record the quantity of rainfall during each storm event during which sampling occurs.

2. The licensee shall determine if statistically significant increases of parameters listed in Tables 1, 2, and 3 of Attachment 13 have occurred over background levels for surface water in the drains. A statistically significant increase shall be determined as follows:

- a. For organic parameters listed in Table 2, the student's t-test with continuity correction as specified in Attachment 12, Part B as the interim statistical procedure.
- b. For parameters listed in Tables 1 and 3 with n values of 4 or more, using the sign test procedures in Attachment 12, Part A as the interim statistical procedure.

A final statistical program shall be developed in accordance with Condition I of this part. If a statistically significant increase is detected, the licensee shall immediately notify the Waste Management Division and arrange resampling as soon as possible to confirm if a statistically significant increase exists.

3. If a statistically significant increase is confirmed by a resampling of the surface water, the licensee shall do the following:
 - a. Notify the Director immediately by calling the Chief of the Waste Management Division, the Waste Management Division District Supervisor, or Department of Natural Resources 24-hour emergency response telephone at 1-800-292-4780.
 - b. Provide follow up notification to the Chief of the Waste Management Division in writing within seven days.
 - c. Within 30 days of receiving results from confirmation sampling, determine whether a discharge to surface water is occurring, or will occur during subsequent storm events, determine the source of the discharge, and take immediate steps to eliminate and prevent any such discharge.
4. The licensee may petition the Director to discontinue surface water monitoring under this license in the event a permit for each surface water discharge is issued by the Department under the National Pollutant Discharge Elimination System (NPDES). Any violation of an NPDES permit is considered a violation of the terms of this license.

F. AMBIENT AIR MONITORING *As the permit*

1. At the time waste is first received in Cell 2, the licensee shall operate the ambient air monitoring program specified in Attachment 16 which shall be considered representative of ambient air. The licensee shall sample at all monitoring locations in accordance with Attachment 16. Monitors shall be operated on a six-day schedule, except June through August, when monitors will be operated on a three-day schedule.
2. The licensee shall submit the results of monitoring to Wayne County Air Pollution Control Division in addition to the Chief of the Waste Management Division on the schedule specified in Condition I.E.9.c. of this license.
3. The Director may waive the requirements of Condition IV.F.1. of this license if the licensee demonstrates that such monitoring is not required or that a lesser degree of monitoring can be utilized to demonstrate compliance with this license.

G. SEDIMENTATION BASIN

1. The licensee shall conduct a sedimentation basin monitoring program of the soils accumulated in the sedimentation basin on a semi-annual basis. Samples shall be taken at the ~~four~~ locations specified on Figure 1-8 of Attachment 15. Individual samples shall be analyzed for the constituents listed on Tables

4 and 5 of Attachment 15. A map identifying each sample location must be submitted with the analytical results in accordance with the schedule specified in Condition I.E.9.c. of this license.

2. Should the sedimentation basin soil analysis conducted under condition G.1. of this part establish that levels of contaminants exist which may create a threat to human health, welfare or the environment, the licensee shall remove and properly dispose of the contaminated soils.
3. If a threat exists as outlined under condition G.2., the licensee shall develop and submit a plan to the Chief of the Waste Management Division to control the accumulation of contamination.

H. SOIL MONITORING

- Will be forwarded to me (Wing)*
1. The licensee shall ~~conduct~~ an annual soil monitoring program to assess any impact that facility operations may have on site haul and access roads. Individual samples shall be analyzed for the constituents listed on Tables 4 and 5 of Attachment 14.

The licensee must submit a map identifying individual sampling locations with the analytical results.

The licensee must submit a program for establishing background levels in an unimpacted area for all the parameters in Tables 4 and 5 of Attachment 14 which includes the sample locations and depths for approval by the Chief of the Waste Management Division within 30 days of the effective date of this license.

2. The licensee shall determine if statistically significant increases of parameters listed in Tables 4 and 5 of Attachment 14 have occurred over background levels established under condition H.1. of this part. A statistically significant increase shall be determined by comparing the sampling results to the background mean plus 3 times the standard deviation.

If a statistically significant increase is detected, the licensee shall immediately notify the Waste Management Division and arrange a resampling as soon as possible to confirm if a statistically significant increase exists.

If a statistically significant increase is confirmed by a resampling of the soil, the licensee shall:

- a. Immediately notify the Director by calling the Chief of the Waste Management Division or the Waste Management Division District Supervisor.
- b. Determine the source of the contamination, and develop a plan for corrective action to remove the contamination.

3. The licensee may petition the Director to discontinue soil monitoring under this license in the event that at some time in the future curb, gutter and sewer is installed to collect the runoff from the haul road and discharge it to the Detroit sewer system with the City's approval.

I. FINAL STATISTICAL EVALUATION PROGRAM

The licensee must submit within 22 months of the effective date of this license a final statistical program for evaluating the data from the Cell 2 and lysimeter leak detection monitoring, surface water monitoring, and soil monitoring program to determine if significant changes occur for evaluating the environmental performance of the site. Approval by the Chief of the Waste Management Division must be received prior to implementation of the statistical program. This program must include a thorough data trend analysis using existing data, a sensitivity analysis, a detailed explanation of the statistical procedure with a basis for selection, and a contingency plan.

LIST OF ATTACHMENTS

1. Waste Analysis Plan
2. Inspection Schedules
3. Personnel Training Outline
4. Contingency Plan
5. Closure Plan
6. Post-Closure Plan
7. Engineering Plans
8. List of Acceptable Waste Types
9. Construction Quality Assurance Plan
10. Leachate Monitoring Program
11. Leak Detection Monitoring Program
12. Statistical Procedures
13. Surface Water Monitoring Program
14. Soil Monitoring Program
15. Sedimentation Basin Monitoring Program
16. Ambient Air Monitoring Program
17. Potentiometric Monitoring Program



RECEIVED

DEC 15 1988

WASTE MANAGEMENT DIV.

Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

December 12, 1988

Mr. Larry AuBuchon, Environmental Quality Analyst
Michigan Department of Natural Resources
S.E. Michigan Field Office
Waste Management Division
505 W. Main St.
Northville, Michigan 48167

Subject: Ford Allen Park Clay Mine (APCM) Landfill
EPA ID No. 980568711

Dear Mr. AuBuchon:

This is in response to our recent telephone conversation and a follow-up discussion you and David Miller of this Office had on November 22, 1988 concerning the subject facility. The following three issues concerning your most recent site inspection, and our subsequent responses to the issues you raised, are addressed below.

Concern: Request for a copy of the manifest generated for the disposal of the sandy soil waste.

Response: Enclosed is a copy of the manifest that accompanied the sandy soil waste shipment, for off-site disposal at Wayne Disposal, Inc., removed from the subject facility on October 7, 1988.

Concern: Request to Submit a revised "Notification of Hazardous Waste Activity", EPA Form 8700-12.

Response: Following my call to Ms. Marie Oliver of EPA Region V made at your request on December 2, 1988, I was contacted by Mr. Ron Brown of EPA Region V, on December 12, 1988. I explained that a submittal of a revised form was not necessary, citing both the statute (RCRA Section 3010) and the regulations (40 CFR 262.12(c)). Notwithstanding the absence of clear regulatory authority in support of this request by MDNR/EPA, Mr. Brown indicated that this "requirement" is derived from departmental "policy" of the agency. So as not to further belabor satisfying your request, a revised "Notification of Hazardous Waste Activity" has been submitted to U.S. EPA Region V, with a copy enclosed for your records.

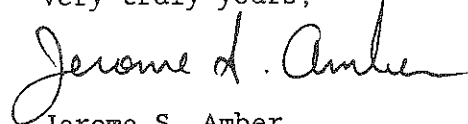
Concern: Request to clarify our intent to maintain the fence and signs at the APCM Landfill.

Response: We believe there may have been a misunderstanding relating to our response to your suggestion to relocate a warning sign as noted in your August 22, 1988 inspection report. Because your inspection report identified a suggested improvement to the facility operation (i.e., repositioning a supplemental warning sign), a second warning sign was posted. We agree that this supplemental warning sign provides added site security, and as always we appreciate your suggestions.

Please note that despite the question of applicability of 40 CFR 265.14(c) and 40 CFR 264.14(c), the signage requirement has been satisfied with the posting of one warning sign at each of the four corners of the hazardous waste disposal area. These warning signs will continue to be maintained. We do not intend to request exemption from the fencing requirements of 40 CFR 264.14(b). The existing security fence, as well as the warning signs attached to the fence, will continue to be maintained.

I hope that we have satisfactorily addressed all issues raised in your October 24, 1988 letter to me. Please contact Messrs. David O'Connor or David Miller, or me, if any questions remain.

Very truly yours,



Jerome S. Amber
Principal Staff Engineer
Stationary Source Environmental
Control Office
313/322-4646

DAO/

Enclosures

cc: Robert Ratz - WCHD
Ardys Bennett - City of Allen Park

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. JOYER
KERRY LAMMER
D. STEWART MYERS
DAVID R. OLSON
RALPH W. FOLGER

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVEN T. JASON BUILDING
P.O. BOX 31000
LANSING, MI 48231

DAVID R. HALEY, Director

FMC, Allen Park Clay Mine

(C)

RECEIVED

DEC 19 1988

WASTE MANAGEMENT DIV.

December 12, 1988

Mr. and Mrs. Robert O'Neill
3585 Elizabeth
Melvindale, Michigan 48122

Dear Mr. and Mrs. O'Neill:

Governor Blanchard has requested me to respond on his behalf to your August 29, 1988 letter concerning the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine landfill.

We are in the process of evaluating comments and issues raised during the public comment period and preparing a responsiveness summary. The issue of location of the landfill relative to residential areas will be addressed in this summary. The summary will be provided to you and other members of the public who have requested this information. Rest assured that no action will be taken on this operating license until all environmental issues have been carefully evaluated and that the license will not be issued unless the facility complies with all applicable environmental regulations.

If you have any questions, please contact me.

Sincerely,

Kenneth Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-2730

cc: Governor James Blanchard
Ms. Barbara McLeod, DNR
Mr. Alan Howard, DNR
Mr. Pete Quackenbush, DNR
Mr. Larry Aubuchon, DNR
Ford Allen Park Op. Lic. Reappl. File

W.H. / H

Oct. 25.

Dear Governor: Nov 2 | 37 1988

We live in the Melvindale Area
near the Oakwood/Southfield dump site.

We are very alarmed that anyone
could make a waste disposal site so
close to our homes.

Please try to stop them before
it is too late.

Thanks

Laurie & Ruth Mace

3585 Elizabeth

Melvindale, Michigan

P.S. My grandchildren live only 1/2 mile on Robert
Street & I am very concerned about toxic waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

RECEIVED

REPLY TO THE ATTENTION OF:

02 DEC 1988

DEC 19 1988

5RA-14

WASTE MANAGEMENT DIV.

David F. Hales, Director
Michigan Department of Natural Resources
Post Office Box 30028
Lansing, Michigan 48909

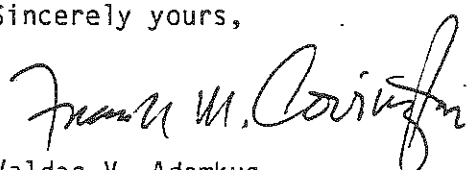
Dear Mr. Hales:

Thank you for your letter dated November 8, 1988, regarding the final decision for the Ford Allen Park Clay Mine Act 64 operating license application.

We appreciate your commitment to the public participation process and agree with the desire to fully respond to all concerns prior to taking final action. We look forward to your final decision on the application.

If my staff or I can be of further assistance, please do not hesitate to contact me.

Sincerely yours,


Valdas V. Adamkus
Regional Administrator

RECEIVED

DEC 02 1988

WASTE MANAGEMENT DIV.

RESOLUTION

CITY OF GIBRALTAR

XC. District
R. Tramb

WHEREAS, recent public hearings and meetings in the City of Allen Park regarding the Ford Motor Company request for a hazardous waste landfill permit, located in the City of Allen Park at approximately Oakwood and I-94 have indicated that the granting of a permit is likely to have a detrimental effect of polluting, impairing or destroying the air, water or other natural resources of the public trust as to constitute a threat to the health, safety, and welfare of the citizens of Allen Park and surrounding communities; and

WHEREAS, the City of Allen Park has already demanded that it receive satisfactory responses to the issues and questions raised regarding the public health, safety and welfare, prior to the agency's final consideration regarding the Ford Motor Company permit; and

WHEREAS, the City has not received any response from the Michigan Department of Natural Resources or the United States Environmental Protection Agency,

THEREFORE, BE IT RESOLVED that the City of Gibraltar joins the City of Allen Park in opposing the granting of a permit to the Ford Motor Company for a hazardous waste landfill; and

BE IT FURTHER RESOLVED that the City of Allen Park demands it be allowed to intervene into the current administrative proceedings by the Michigan Department of Natural Resources and the United States Environmental Protection Agency and be specifically allowed to participate in all facets of the agency's consideration of the Ford Motor Company hazardous waste landfill permit, pursuant to the Anderson Rockwell Michigan Environmental Protection Act.

BE IT FURTHER RESOLVED that a copy of this Resolution be forwarded to the Michigan Department of Natural Resources, the United States Environmental Protection Agency, United States Senator's Carl Levin and Donald W. Riegle, Jr., United States Representative John D. Dingell, Governor James J. Blanchard, State Senator Christopher Dingell, State Representatives Joseph Palamara, Richard A. Young and Vincent "Joe" Porreca and to surrounding communities.

ADOPTED, APPROVED AND PASSED by the City Council of the City of Gibraltar at a regular meeting held on 14th day of November, 1988.

I, Mary H. Bilk, duly elected City Clerk of the City of Gibraltar do hereby certify that the foregoing is a true copy of a Resolution that was passed at a regular meeting held on the 14th day of November, 1988.

FWC Allen Park
RECEIVED

DEC 12 1988

WASTE MANAGEMENT DIV.

NATURAL RESOURCES COMMISSION

THOMAS L. ANDERSON
MARLENE J. BLANCHARD
JORDON E. BUYER
KEVIN KAMMER
J. WILLIAM KNEFF
CAROL A. LEE
ALAN HOWARD

STATE OF MICHIGAN



JAMES J. BLANCHARD Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENSON MASSON BUILDING
100 BOA AVENUE
LANSING, MICHIGAN 48206

DAVID F. HALEY Director

December 2, 1988

Mr. John T. Shelton
City Clerk
City of River Rouge
10600 West Jefferson Avenue
River Rouge, Michigan 48218

Dear Mr. Shelton:

Governor Blanchard has requested me to respond on his behalf to your October 27, 1988 letter concerning the City of River Rouge opposition to the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine.

We are in the process of preparing a responsiveness summary to the comments and issues raised during the public comment period. The City of Allen Park has been notified that they will be provided with a copy of the summary as soon as it is completed. The Department will notify the City of Allen Park of any licensing activity and allow them the opportunity to participate, to the extent possible. Rest assured that no action will be taken on this operating license until all environmental issues have been carefully evaluated and compliance with all applicable environmental regulations is assured.

If you have any questions, please contact me.

Sincerely,

Kenneth Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-2730

cc: Governor James Blanchard
Ms. Barbara McLeod, DNR
Mr. Alan Howard, DNR
Mr. Peter Quackenbush, DNR
Mr. Larry Aubuchon, DNR

City of River Rouge

MICHIGAN

Office of the City Clerk

10600 WEST JEFFERSON AVENUE
RIVER ROUGE, MICHIGAN 48218

PHONE 842-5604

JOHN T. SHELTON
CITY CLERK

XXXXXXXXXX
XXXXXXXXXX

October 27, 1988

Dear Governor Blanchard:

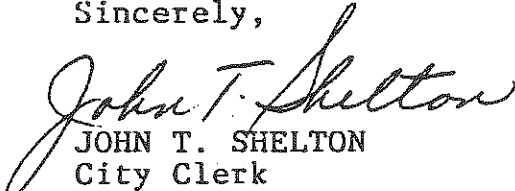
At the Regular Council Meeting held Tuesday, October 25, 1988, the Mayor and City Council took the following action

88-430

Moved by Commissioner R. Bowdler, supported by Mayor Cooney, that the City go on record as opposed to the waste site in the City of Allen Park and for a letter of this opposition be sent to Governor Blanchard, Congressman John Dingell, State Representative Robert DeMars and Senator Chris Dingell. Carried unanimously.

We would appreciate any assistance that you may be able to extend to us.

Sincerely,


JOHN T. SHELTON
City Clerk

FMC AIL- P. C.

RECEIVED

DEC 12 1988

WASTE MANAGEMENT DIV.

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30013
LANSING, MI 48203

DAVID F. HALE, Director

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE L. FLORENT
VERNON J. D. ET
HARRY SAWYER
J. W. J. J. J. J. J.
J. W. J. J. J. J. J.
J. W. J. J. J. J. J.

December 2, 1988

Ms. Bernice Weiss
City Clerk
City of Allen Park
16850 Southfield Road
Allen Park, Michigan 48101

Dear Ms. Weiss:

Governor Blanchard has requested me to respond on his behalf to your October 13, 1988 letter concerning the City of Allen Park opposition to the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine.

We are in the process of preparing a responsiveness summary to the comments and issues raised during the public comment period. The City of Allen Park will be provided with a copy of the summary as soon as it is completed. The Department will notify the City of Allen Park of any licensing activity and allow them the opportunity to participate, to the extent possible. Rest assured that no action will be taken on this operating license until all environmental issues have been carefully evaluated and compliance with all applicable environmental regulations is assured.

If you have any questions, please contact me.

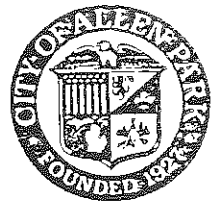
Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth Burda".

Kenneth Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-2730

cc: Governor James Blanchard
Ms. Barbara McLeod, DNR
Mr. Alan Howard, DNR
Mr. Peter Quackenbush, DNR
Mr. Larry Aubuchon, DNR

City of Allen Park



OFFICE OF CLERK
16850 SOUTHFIELD ROAD
ALLEN PARK, MICHIGAN 48101
Phone 928-1400

RESOLUTION

REGULAR MEETING OF THE COUNCIL OF THE CITY OF ALLEN PARK, WAYNE COUNTY, MICHIGAN, HELD ON TUESDAY, SEPTEMBER 27, 1988, IN THE COUNCIL CHAMBERS IN THE MUNICIPAL BUILDING:

PRESIDING: Mayor Gerald N. Richards.

PRESENT: Councilmen Babbage, Boccabella, Duda, Launiere, Pretty.

ABSENT: Councilwoman Fezzey, excused.

Motion by Babbage.

Supported by Duda.

Whereas, recent public hearings and meetings in the City of Allen Park regarding the Ford Motor Company request for a hazardous waste landfill permit, located in the City of Allen Park at approximately Oakwood and I-94, have indicated that the granting of a permit is likely to have a detrimental effect of polluting, impairing or destroying the air, water or other natural resources of the public trust so as to constitute a threat to the health, safety, and welfare of the citizens of Allen Park and surrounding communities; and

Whereas, the City of Allen Park has already demanded that it receive satisfactory responses to the issues and questions raised regarding the public health, safety and welfare, prior to the agency's final consideration regarding the Ford Motor Company permit; and

Whereas, the City has not received any response from the Michigan Department of Natural Resources or the United States Environmental Protection Agency,

Therefore, Be It Resolved, that the City of Allen Park is opposed to the granting of a permit to the Ford Motor Company for a hazardous waste landfill; and

Be It Further Resolved, that the City of Allen Park demands it be allowed to intervene into the current administrative proceedings by the Michigan Department of Natural Resources and the United States Environmental Protection Agency and be specifically allowed to participate in all facets of the agency's consideration of the Ford Motor Company hazardous waste landfill permit, pursuant to the Anderson Rockwell Michigan Environmental Protection Act.

Be It Further Resolved, that a copy of this Resolution be forwarded to the Michigan Department of Natural Resources, the United States Environmental Protection Agency, United States Senators Carl Levin and Donald W. Riegle, Jr., United States Representative John D. Dingell, Governor James J. Blanchard, State Senator Christopher Dingell, State Representatives Joseph Palamara and Richard A. Young, and to surrounding communities.

Motion adopted unanimously.

I, Bernice Weiss, City Clerk of the City of Allen Park, Wayne County, Michigan, do hereby certify that the foregoing is a true copy of a Resolution adopted by the Council of the City of Allen Park.

A handwritten signature in cursive script, appearing to read "Bernice Weiss", is written over a horizontal line.

BERNICE WEISS
CITY CLERK

bw

Dated: October 3, 1988

RECEIVED

DEC 12 1988

WASTE MANAGEMENT DIV.

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

 STEVENS T. MASON BUILDING
 P.O. BOX 30028
 LANSING, MI 48906

DAVID F. HALES, Director

NATURAL RESOURCES COMMISSION

 THOMAS J. ANDERSON
 MARLENE J. FLUHARTY
 GORDON E. GUYER
 KERRY HAMMER
 D. STEWART MYERS
 DAVID D. OLSON
 RICHARD POLKORE

November 30, 1988

Mr. Kenneth D. Kruse
 Office of the City Attorneys
 City of Allen Park
 Suite 100-7000 Roosevelt
 Allen Park, Michigan 48101

Dear Mr. Kruse:

Director Hales has asked me to respond on his behalf to your October 6, 1988 letter submitting a Notice of Intervention and City Council Resolution concerning the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine landfill.

We are in the process of completing the responsiveness summary to the comments and issues raised at the recent public hearing and public meeting. A copy of the summary will be sent to the City of Allen Park as soon as it is completed. The Waste Management Division will provide the City with any additional documents submitted by Ford Motor Company and inform the City of any meetings between the Department and the Company regarding the licensing of this facility.

You may rest assured that no action will be taken on this license until all environmental issues have been carefully evaluated and that the license will not be issued unless the facility complies with all applicable environmental regulations.

If you have any questions, please contact me.

Sincerely,

Kenneth Burda, Chief
 Hazardous Waste Permits Section
 Waste Management Division
 517-373-2730

cc: Director David Hales
 Mr. Alan Howard, MDNR
 Mr. Ardys Bennett, City of Allen Park
 Mr. Larry Aubuchon, MDNR
 Mr. Peter Quackenbush, MDNR
 Ford Allen Park Op. Lic. Reappl. File

RALPH F. PAGNUCCO
KENNETH D. KRUSE
DAVID B. TAMSEN

City of Allen Park

OFFICE OF THE CITY ATTORNEYS
SUITE 100 - 7000 ROOSEVELT
ALLEN PARK, MICHIGAN 48101
(313) 386-1111



October 6, 1988

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. David F. Hales
Director
Department of Natural Resources
Stevens T. Mason Building
Box 30028
Lansing, MI 48909

Re: Ford Motor Company Request for Permit/License
for Hazardous Waste Landfill in the City of
Allen Park

Dear Mr. Hales:

Enclosed please find the City of Allen Park's Notice of Intervention and the City Council's Resolution pertaining to same regarding the Ford Motor Company request for a permit/license for a hazardous waste landfill in the City of Allen Park.

Yours truly,


Kenneth D. Kruse

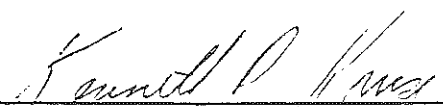
KDK/tak
Enclosure

NOTICE OF INTERVENTION REGARDING
FORD MOTOR COMPANY REQUEST FOR PERMIT/LICENSE
FOR HAZARDOUS WASTE LANDFILL IN THE CITY OF ALLEN PARK

PLEASE TAKE NOTICE the undersigned, as attorney for the City of Allen Park, is hereby intervening in the above-referenced matter presently pending before the Michigan Department of Natural Resources and the United States Environmental Protection Agency for the reason that such proceedings materially affect and impact the human and natural environment within the meaning of Section 5 of the Anderson Rockwell Michigan Environmental Protection Act (Being MCLA Section 691.1205). Pursuant to this Petition for Intervention, the undersigned does specifically request notification of all hearings to be had before the Michigan Department of Natural Resources and/or the United States Environmental Protection Agency, and further, to be notified of any and all filings, including supplemental documents, new applications, memoranda of law and the right. The undersigned does specifically request notice of and the opportunity to be present and to be heard at any and all proceedings concerning the above-referenced matter.

PAGNUCCO & KRUSE

BY:


KENNETH D. KRUSE (P 16271)
Attorneys for the City of
Allen Park
7000 Roosevelt, Suite 100
Allen Park, Michigan 48101
(313) 386-1111

DATED: October 6, 1988

City of Allen Park

OFFICE OF CLERK
16850 SOUTHFIELD ROAD
ALLEN PARK, MICHIGAN 48101
Phone 928-1400



RESOLUTION

REGULAR MEETING OF THE COUNCIL OF THE CITY OF ALLEN PARK, WAYNE COUNTY, MICHIGAN, HELD ON TUESDAY, SEPTEMBER 27, 1988, IN THE COUNCIL CHAMBERS IN THE MUNICIPAL BUILDING:

PRESIDING: Mayor Gerald N. Richards.

PRESENT: Councilmen Babbage, Boccabella, Duda, Launiere, Fretty.

ABSENT: Councilwoman Fezzey, excused.

Motion by Babbage.

Supported by Duda.

Whereas, recent public hearings and meetings in the City of Allen Park regarding the Ford Motor Company request for a hazardous waste landfill permit, located in the City of Allen Park at approximately Oakwood and I-94, have indicated that the granting of a permit is likely to have a detrimental effect of polluting, impairing or destroying the air, water or other natural resources of the public trust so as to constitute a threat to the health, safety, and welfare of the citizens of Allen Park and surrounding communities; and

Whereas, the City of Allen Park has already demanded that it receive satisfactory responses to the issues and questions raised regarding the public health, safety and welfare, prior to the agency's final consideration regarding the Ford Motor Company permit; and

Whereas, the City has not received any response from the Michigan Department of Natural Resources or the United States Environmental Protection Agency,

Therefore, Be It Resolved, that the City of Allen Park is opposed to the granting of a permit to the Ford Motor Company for a hazardous waste landfill; and

Be It Further Resolved, that the City of Allen Park demands it be allowed to intervene into the current administrative proceedings by the Michigan Department of Natural Resources and the United States Environmental Protection Agency and be specifically allowed to participate in all facets of the agency's consideration of the Ford Motor Company hazardous waste landfill permit, pursuant to the Anderson Rockwell Michigan Environmental Protection Act.

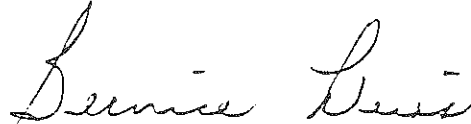
Be It Further Resolved, that a copy of this Resolution be forwarded to the Michigan Department of Natural Resources, the United States Environmental Protection Agency, United States Senators Carl Levin and Donald W. Riegle, Jr., United States Representative John D. Dingell, Governor James J. Blanchard, State Senator Christopher Dingell, State Representatives Joseph Palamara and Richard A. Young, and to surrounding communities.

Motion adopted unanimously.

RESOLUTION

Page 2

I, Bernice Weiss, City Clerk of the City of Allen Park, Wayne County, Michigan, do hereby certify that the foregoing is a true copy of a Resolution adopted by the Council of the City of Allen Park.



BERNICE WEISS
CITY CLERK

bw

Dated: October 3, 1988

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30026
LANSING MI 48209

DAVID P. HALES, Director

RECEIVED

NOV 22 1988

WASTE MANAGEMENT DIV.

November 15, 1988

Mr. Norman F. Koszuta
City Clerk
City of Flat Rock
25500 Gibraltar Road
Flat Rock, Michigan 48134

Dear Mr. Koszuta:

Director Hales has requested me to respond on his behalf to your October 17, 1988 letter forwarding the City of Flat Rock resolution concerning licensing of the Ford Motor Company Allen Park Clay Mine hazardous Waste landfill.

We are in the process of preparing a responsiveness summary to the comments and issues raised during the public comment period. The City of Allen Park has been notified that they will be provided with a copy of the summary as soon as it is completed. The Department will notify the City of Allen Park of any licensing activity and allow them the opportunity to participate, to the extent possible. Rest assured that no action will be taken on this operating license until all environmental issues have been carefully evaluated and compliance with all applicable environmental regulations is assured.

If you have any questions, please contact me.

Sincerely,

Kenneth Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-2730

cc: Mr. Delbert Rector, DNR
Mr. Alan Howard, DNR
Mr. Peter Quackenbush, DNR
Mr. Larry Aubuchon, DNR
Ford Allen Park Op. Lic. Reappl. File

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 10100
LANSING, MI 48906

DAVID F. HALES, Director

RECEIVED

NOV 22 1988

November 14, 1988

Ms. Joyce Dickelman
15660 Beatrice
Allen Park, Michigan 48101

Dear Ms. Dickelman:

Director Hales has requested me to respond on his behalf to your November 3, 1988, letter concerning the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine landfill.

We are in the process of preparing a responsiveness summary to the comments and issues raised during the public comment period. This summary will be provided to you and other members of the public who have requested this information. Rest assured that no action will be taken on this operating license until all environmental issues have been carefully evaluated and that the license will not be issued unless the facility complies with all applicable environmental regulations.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script, reading "Kenneth Burda".

Kenneth Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-2730

cc: Governor James Blanchard
Director David Hales
Mr. Alan Howard, DNR
Mr. Peter Quackenbush, DNR
Mr. Larry Aubuchon, DNR



RECEIVED

NOV 08 1988

WASTE MANAGEMENT DIV.

Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

November 7, 1988

Mr. Larry AuBuchon, Environmental Quality Analyst
Michigan Department of Natural Resources
S.E. Michigan Field Office
Waste Management Division
505 W. Main St.
Northville, Michigan 48167

Re: Ford Allen Park Clay Mine Landfill
October 24, 1988 Letter

Dear Mr. AuBuchon:

Your October 24, 1988 letter makes note of several items concerning the subject facility. The status of the items in your letter for which a response was requested are addressed below.

Concern: A final report detailing the placement of sandy soil waste from the sewer lines into Disposal Cell III and the ensuing clean-up of this area must be submitted.

Response: Attached is a summary report detailing the events surrounding the handling and final disposal of the sandy soil waste that had accumulated in the facility's sewer lines. Included with the attachment is the sampling/analytical data supporting the clean-up of materials removed from Disposal Cell III.

Concern: It is suggested that "Notification of Hazardous Waste Activity", EPA Form 8700-12, be submitted to identify the facility as a generator in addition to being a TSDF.

Response: RCRA Section 3010(a) states: "Not more than one such notification shall be required to be filed with respect to the same substance". Thus, a second notification is not required according to clear statutory language. Since this has apparently become a minor point of contention, I plan to

call you sometime later this week, so that we may discuss this issue in addition to any other issues of concern to you.

Very truly yours,

Jerome S. Amber

Jerome S. Amber
Principal Staff Engineer
Stationary Source Environmental
Control Office
313/322-4646

DAO/

Attachment

1. copy of the manifest
2. Demonstration

Tx J Amber 11/22/82

Re -

SOIL SAMPLING PROTOCOL
Allen Park Clay Mine Landfill (APCML)

Sandy soil waste ($2/3 \text{ yd}^3$), removed from the APCML totally enclosed treatment facility and its associated sewer line on July 26, 1988, was inadvertently placed in disposal Cell III. This material, as well as all potentially contaminated underlying soils have since been removed from this area. The Ford Motor Company Stationary Source Environmental Control Office (SSECO) coordinated the verification sampling of the post-cleanup excavated area to ensure complete removal.

On August 30, 1988 the sandy soil waste was sampled using a thief sampler to ensure consistency with EPA SW-846 test methods, and submitted for laboratory analysis. On August 31, 1988 an endloader placed this material in a 30 cubic yard roll-off box. Soils and Type III solid waste beneath and adjacent to the sandy soil waste were excavated from an area 18' X 12' to a depth of approximately one foot. A total of 12 cubic yards were placed in the roll-off box for disposal as a hazardous waste at the Wayne Disposal, Inc. landfill. Because this material was designated as "leachate-derived" K087 and K061 waste and subject to the new EPA land disposal restrictions, a Certification Statement was sent to the USEPA Administrator certifying that the waste was sent to the Wayne Disposal, Inc. landfill, which has been constructed in accordance with the minimum technological requirements of RCRA, as amended, Section 3004(o).

On September 8, 1988 random samples of the Cell III excavated area were collected and composited for analysis. Since "background" in Cell III consisted of Type III waste, it was important to choose some constituent expected to be present in the sandy soil waste yet absent from Cell III wastes. Phenolics, which are detectable in Cell I leachate, provided the basis for verifying complete removal from disposal Cell III.

Table 1 summarizes the laboratory analyses of both the sandy soil waste as well as the verification sampling results of the Cell III excavated area. The concentration of Total Phenolics in the sandy soil waste was 1.2 mg/kg and from the Cell III excavated area was less than 0.002 mg/kg. The Cell III excavated area is deemed clean of this sandy soil waste based on these analytical results. On October 7, 1988, 12 cubic yards of hazardous waste were transported to Wayne Disposal, Inc. for disposal (Michigan Manifest No. 1298146).

Prepared by:

Stationary Source Environmental
Control Office
Ford Motor Company
November 7, 1988

RECEIVED

NOV 14 1988

WASTE MANAGEMENT DIV.



RECEIVED

NOV 08 1988

Waste Management
Division

Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive *
Dearborn, Michigan 48120

November 4, 1980

Mr. Pete Quackenbush
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Re: Restrictive Covenant
Ford Allen Park Clay Mine
MID No. 980568711

Dear Mr. Quackenbush:

Enclosed is a fully executed Restrictive Covenant for the Clay Mine that should be filed for record by the Michigan Department of Natural Resources in the office of the register of deeds in Wayne County, Michigan.

Should you have any questions regarding this matter, please contact David O'Connor at (313) 322-0701.

Yours truly,

A handwritten signature in cursive script that reads "Jerome S. Amber".

Jerome S. Amber
Principal Staff Engineer
Stationary Source Environmental
Control Office

DSM

Enclosure

cc: Ardys Bennett - City of Allen Park
Richard Traub - USEPA, Region V

RESTRICTIVE COVENANT

THIS RESTRICTIVE COVENANT made as of the _____ day
of NOV 3 1988, 1988, by Ford Motor Company, a Delaware
corporation ("Ford") whose address is The American Road, Dearborn,
Michigan 48121;

WITNESSETH THAT:

WHEREAS, Ford has applied for an operating license under
provisions of 1979 PA 64, MCLA 299.501 et seq, as amended, ("Act
64") for a disposal facility upon land situated in the City of
Allen Park, County of Wayne, more particularly described on the
Exhibit A attached hereto (the "Property"); and

WHEREAS, Section 39 of Act 64 requires that as a condition of
obtaining an operating license, an instrument imposing a
restrictive covenant upon the land involved has been executed by
all the owners of the tract of land upon which the landfill is
located;

NOW, THEREFORE, Ford declares and covenants that the Property
has been or may be used as a landfill for disposal of hazardous
waste, and that neither Ford nor its agents, or employees, nor any
of its heirs, successors, lessees or assignees shall engage in
filling, grading, excavating, building, drilling or mining on the

LEGAL DESCRIPTION OF HAZARDOUS WASTE CELLS
AT FORD MOTOR COMPANY
ALLEN PARK CLAY MINE

A parcel of land in Private Clain 66 also being part of Lots 1, 2, 3 and 4 of Walker and Wilcox Plat of P.C. 66, City of Allen Park, Wayne County, Michigan, more particularly described as:

Beginning at a point distant S 58° 37' 20" E, 1697.41 feet, and S 48° 23' 02" W, 491.60 feet, and S 23° 45' 37" W, 583.36 feet, and S 70° 48' 45" E, 527.01 feet from the SE corner of Southfield Expressway (350 feet wide) and Oakwood Boulevard (100 feet wide) and continuing thence S 61° 21' 45" E, 218.07 feet; thence S 85° 38' 46" E, 143.76 feet; thence S 62° 00' 53" E, 47.79 feet; thence S 36° 52' 13" E, 101.55 feet, thence S 38° 04' 32" E, 103.44 feet; thence S 19° 17' 50" W, 281.45 feet; thence S 31° 34' 40" W, 294.98 feet; thence N 58° 26' 05" W, 644.32 feet; thence S 31° 32' 52" W, 106.55 feet; thence N 58° 26' 05" W, 525.00 feet; thence N 31° 32' 52" E, 643.15 feet; thence S 61° 21' 45" E, 525.68 feet to the point of beginning. Containing 16.500 acres of land, more or less.

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

David F. Hales, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

October 24, 1988

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

Mr. Jerome S. Amber
Principal Staff Engineer
Ford Motor Company
Stationary Source Environmental Control Office
15201 Century Drive, Suite 608
Dearborn, MI 48120

RE: FMC, Allen Park Clay Mine
MID 980568711

Dear Mr. Amber,

This letter is to acknowledge receipt of your letter dated August 22, 1988.

Under 40 CFR 264.14 there must be a demonstration to the Regional Administrator, in this case the Director, that the facility is exempt from the fencing and sign requirements. Even though the facility is under interim status, this demonstration should have been in place based on the fact that a joint permit is pending. The facility has been and will continue to be subject to the requirements of 40 CFR 265.14(c).

A finalized report regarding the placement of 2/3 cubic yards of waste from the leachate tank/sewer lines into the non-hazardous disposal area should be submitted. The report should include the final disposition of the waste and sampling data supporting the clean-up.

A facility must accurately reflect, through the filing of EPA Form 8700-12, the hazardous waste activity at that facility. Based on this incident, a subsequent notification is to be filed with U.S. EPA reflecting your generator activity and a copy is to be sent to this office. This was verbally requested several weeks ago and has not been provided.

Page 2, 10/24/88
Ford Motor Co.
Dearborn, MI
RE: MID 980568711

We request you respond by November 7, 1988 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,



Larry AuBuchon
Environmental Quality Analyst

LA/aw
cc: B. Okwumabua
Ardys Bennett
U.S. EPA, Region V

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
STEWART MYERS
/ID O. OLSON
LYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

David F. Hales, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

October 20, 1988

Mr. Jerome S. Amber
Principal Staff Engineer
Ford Motor Company
Stationary Source Environmental Control Office°
15201 Century Drive, Suite 608
Dearborn, MI 48120

RE: FMC, Allen Park Clay Mine
MID 980568711

Dear Mr. Amber,

Enclosed you will find the completed CME report which evaluates groundwater compliance at the subject site. Mr. Terry McNiel's, September 28, 1988 summary report is also included. The facility was found to be in compliance with the provisions of the U.S. EPA partial waiver and that an acceptable demonstration has been made for granting a full waiver under Act 64.

The only area of concern that Mr. McNiel identified related to seal problems with MW102D, MW104D and MW5D. Although these problems have been corrected, continued review and maintenance is necessary to ensure these wells are operating properly.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,

A handwritten signature in cursive script that reads "Larry AuBuchon".

Larry AuBuchon
Environmental Quality Analyst

Enclosure

LA:bs

cc: Ben Okwumabua
Terry McNiel
Ardys D. Bennett

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

~~XXXXXXXXXXXX~~

David F. Hales, Director

October 18, 1988

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
J. STEWART MYERS
JAVID D. OLSON
RAYMOND POUPORE

RECEIVED

OCT 25 1989

WASTE MANAGEMENT DIV.

The Honorable Gerald Richards, Mayor
City of Allen Park
16850 Southfield Road
Allen Park, Michigan 48101

Dear Mayor Richards:

Director David Hales has asked me to respond on his behalf to your September 19, 1988 letter concerning the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine landfill.

We are in the process of preparing a responsiveness summary to the comments and issues raised at the recent public meeting and a copy will be sent to you as soon as it is completed. You may rest assured that no action will be taken on this license until all environmental issues have been carefully evaluated and that the license will not be issued unless the facility complies with all applicable environmental regulations.

If you have any questions, please contact me.

Sincerely,

Dennis M. Drake
for Alan J. Howard, Chief
Waste Management Division
517-373-2730

cc: Mr. Rich Traub, U.S. EPA
Director David Hales
Ms. Barbara McLeod, DNR
Mr. Kenneth Burda, DNR
✓ Mr. Larry Aubuchon, DNR
Mr. Peter Quackenbush, DNR
Ford Allen Park Op. Lic. Reappl. File

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

~~XEROX COPY~~
David F. Hales, Director

October 14, 1988

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
AYMOND POUPORE

RECEIVED

OCT 26 1989

WASTE MANAGEMENT DIV.

Mr. and Mrs. Edward Bennett
1727 Linden
Dearborn, Michigan 48124

Dear Mr. and Mrs. Bennett:

Governor Blanchard has requested me to respond on his behalf to your August 29, 1988, letter concerning the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine landfill.

In response to the concern raised at the public hearing, the public comment period for the draft operating license was extended to September 17, 1988, and a public meeting was held on September 15, 1988, to allow more opportunity for the public to air their concerns.

We are in the process of preparing a responsiveness summary to the comments and issues raised during the public comment period. This summary will be provided to you and other members of the public who have requested this information. Rest assured that no action will be taken on this operating license until all environmental issues have been carefully evaluated and that the license will not be issued unless the facility complies with all applicable environmental regulations.

If you have any questions, please contact me.

Sincerely,

Kenneth Burda

Kenneth Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-2730

cc: Governor James Blanchard
Senator Donald Riegler
Congressman John Dingell
Ms. Barbara McLeod, DNR
Mr. Alan Howard, DNR
Mr. Peter Quackenbush, DNR
Mr. Larry Aubuchon, DNR

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

GORDON E. GUYER, Director

RECEIVED

OCT 25 1988

WASTE MANAGEMENT DIV.

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

October 14, 1988

Mr. and Mrs. Edward Bennett
1727 Linden
Dearborn, Michigan 48124

Dear Mr. and Mrs. Bennett:

Governor Blanchard has requested me to respond on his behalf to your August 29, 1988, letter concerning the draft hazardous waste facility operating license for the Ford Motor Company Allen Park Clay Mine landfill.

In response to the concern raised at the public hearing, the public comment period for the draft operating license was extended to September 17, 1988, and a public meeting was held on September 15, 1988, to allow more opportunity for the public to air their concerns.

We are in the process of preparing a responsiveness summary to the comments and issues raised during the public comment period. This summary will be provided to you and other members of the public who have requested this information. Rest assured that no action will be taken on this operating license until all environmental issues have been carefully evaluated and that the license will not be issued unless the facility complies with all applicable environmental regulations.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth Burda".

Kenneth Burda, Chief
Hazardous Waste Permits Section
Waste Management Division
517-373-2730

cc: Governor James Blanchard
Senator Donald Riegler
Congressman John Dingle
Ms. Barbara McLeod, DNR
Mr. Alan Howard, DNR
Mr. Peter Quackenbush, DNR
Mr. Larry Aubuchon, DNR

CITY OF LINCOLN PARK, MICHIGAN
CERTIFIED COPY OF RESOLUTION #88-112

KL: BCU
CHK: KED / O.P. L. FILE
FMS- Allen-DK
C

REGULAR MEETING OF THE MAYOR AND COUNCIL OF THE CITY OF LINCOLN PARK, WAYNE COUNTY, MICHIGAN, HELD IN THE COUNCIL CHAMBERS OF THE MUNICIPAL BUILDING,

UNDER THE DATE OF: October 11, 1988

MOVED BY Mayor Hever

SUPPORTED BY The Full Council

WHEREAS, recent public hearings and meetings in the City of Allen Park regarding the Ford Motor Company request for a hazardous waste landfill permit, located in the City of Allen Park at approximately Oakwood and I-94, have indicated that the granting of a permit is likely to have a detrimental effect of polluting, impairing or destroying the air, water or other natural resources of the public trust so as to constitute a threat to the health, safety, and welfare of the citizens of Lincoln Park and surrounding communities; and

WHEREAS, the City of Allen Park has already demanded that it receive satisfactory responses to the issues and questions raised regarding the public health, safety and welfare, prior to the agency's final consideration regarding the Ford Motor Company permit; and

WHEREAS, the City has not received any response from the Michigan Department of Natural Resources or the United States Environmental Protection Agency,

THEREFORE, BE IT RESOLVED, that the City of Lincoln Park is opposed to the granting of a permit to the Ford Motor Company for a hazardous waste landfill; and

BE IT FURTHER RESOLVED, that a copy of this Resolution be forwarded to the Michigan Department of Natural Resources, the United States Environmental Protection Agency, United States Senators Carl Levin and Donald W. Riegle, Jr., United States Representative John D. Dingell; Governor James J. Blanchard, State Senator Christopher Dingell, State Representatives Joseph Palamara, Richard Young, William D. Ford, County Commissioner William O'Neil, State Representative Robert A. DeMars, Ford Motor Company and to surrounding communities.

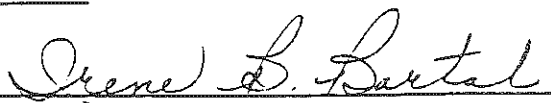
Motion unanimously carried.

I, IRENE B. BARTAL, duly authorized City Clerk of the City of Lincoln Park, do hereby certify that the above is a true copy of a Resolution adopted by the City Council at a Regular Meeting held under the date of: October 11, 1988.

RECEIVED

OCT 14 1988

Waste Management
Division


IRENE B. BARTAL CITY CLERK

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director *

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

July 12, 1989

Mr. David O'Connor
Environmental Control Engineer
Ford Motor Company
15201 Century Drive, Suite 608
Dearborn, Michigan 48120

Dear Mr. O'Connor,

RE: Ford Motor Company (Allen Park), MID 980 568 711

On May 23, 1989, an O&M inspection was completed by Jan Sealock and Terry McNeil, Geotechnical Support Unit, Waste Management Division. The report is enclosed with this letter. A summary memo in the report, dated June 29, 1989, details the attached listing of conclusions and recommendations/violations.

Violations of the groundwater monitoring program have been found with the operation and reporting of this monitoring system pursuant to (Act 64 P.A. 1979, as amended, Part 10, Rule 299.11003 (n) referencing Part 265 subpart F of RCRA or your Act 64 Operating License).

Additional information is contained within the enclosed O&M report. You are requested to respond by August 15, 1989, addressing each of the issues outlined in this letter.

A copy of your response is also to be sent to Jan Sealock, Waste Management Division, Department of Natural Resources, P.O. Box 30241, Lansing, MI. 48909.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

D. Montgomery → M. Sabadaska

June 29, 1989

TO: Benedict Okwumabua, Supervisor
Detroit District, WMD

FROM: Jan Sealock J.S.
Geotechnical Unit, WMD

SUBJECT: O&M Summary Letter
Ford Allen Park - Clay Mine
MID 980 568 711

An Operation and Maintenance Inspection was completed on May 23, 1989, for the Ford Allen Park - Clay Mine facility located in Dearborn, Michigan. This inspection includes an analysis of the potentiometric monitoring program and a review of the operating record located at the facility. Ford Allen Park has been approved for a groundwater monitoring waiver. No groundwater samples were, therefore, collected at this facility.

The environmental monitoring programs conducted at the facility were reviewed from the application for a Michigan Act 64 operating license. As discussed with David O'Connor during the O&M inspection on May 23, 1989, an inventory including detailed calibration and maintenance procedures should be documented for each environmental monitoring device utilized at the facility.

The sampling and analysis plan must be kept with records on-site. This plan should develop and follow a written schedule for the inspection of the monitoring well system.

Static water elevations should be taken by converting the total inches above the outer protective casing to feet and adding the known USGS outer protective casing elevation of the well. Currently the measurement is being taken from the top of the well casing material which has uneven edges. This is not an acceptable well survey mark for taking readings.

This concludes the summary review of the Operation and Maintenance Inspection. A more detailed Sampling and Analysis Inspection is included in the report. Please find the summary recommendation/violation attachment. These recommendations/violations should be addressed to me by the facility by August 15, 1989. If you have any questions, please contact me at 517-373-4740.

cc: D. Montgomery/M. Sabadaska ✓
D. Drake/C&E File
O&M Report
Geotech File



Attachment
Ford Allen Park - Clay Mine
MID 980 568 711

O&M Inspection 5/23/89
Summary Letter 6/28/89

1. The facility will need to provide an inventory for each environmental monitoring device including detailed calibrations and maintenance procedures.
2. The facility will need to provide a sampling and analysis plan that must be kept with records on-site. The plan should include a written schedule for the inspection of the monitoring well system.
3. Static water elevations should be taken by converting the total inches above the outer protective casing to feet and adding the known USGS outer protective casing elevation of the well. The top of the well's casing has uneven edges causing an unacceptable well survey mark.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

September 28, 1988

TO: Ben Okumabua, Northville District Supervisor,
Waste Management Division

FROM: Terry McNiel, Geological Support Unit,
Waste Management Division *Tmc*

SUBJECT: CME Summary Report
Ford Allen Park Claymine Landfill- Allen Park, MI
MID 980 568 711

In summary of the CME inspection conducted at the Ford Allen Park Claymine Landfill, it has been found that the facility is in compliance with the provisions of the U.S. EPA partial waiver and that an acceptable demonstration has been made for the granting of a full waiver under Act 64.

The only concern noted by this inspection was relative to the maintenance and upkeep of the wells to be used for routine piezometric level monitoring under the proposed operating license reissuance. Because of the flowing conditions of the confined aquifer, unique construction details such as seals and pressure tubing require special attention on a routine basis. This was reflected during this inspection by seal problems with MW 102D, MW 104D and MW 5D. These problems have been corrected. Next year's inspection should look closely at this area.

Please call if you have any questions, or require clarification of this evaluation.

cc: CME Report
Mr. D. Drake/C&E File
Ms. Marilyn Sabadaska
Ms D. Montgomery/Geotech File
Mr. J. Bohunsky

FY 1988 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: MI10921542111

2. HANDLER NAME: Ford - Allen Park claymine CF

3. ADDRESS: Allen Park, MI

4. Data Entry: New ☒ Update ☐

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 5/18/88

5a. AGENCY RESPONSIBLE FOR EVALUATION: 5

Put code in box

E = EPA
S = State
C = Contractor/EPA

O = Other
B = Contractor/State
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:

Select Evaluation Type and insert in box: 4

1 = Compliance Eval. Inspection (CEI)
2 = Sampling Inspection
3 = Record Review

4 = Comp GWH Eval (CNE)
5 = Compliance Sched. Eval
11 = Case Dev. Inspection
12 = O&M Inspection

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): _/_/

7a. Eval. Comments: _____

8. CLASS and VIOLATIONS		Violations/Releases									
Key.	Class of Violation	GWH/RLSR	C/PC	Fin. Res	Pt. B	Cmpl. Sch	Manifest	Land-Ban	Other		
'X' = Violations, no Specialties	I	0									
'B' = Violations & Specialty											
'S' = Same Viol./Specialty											
'Z' = Pending determination	II	0									
'O' = No Viol or Specialty found											
		Acceptable Codes									
Specialties		X	X	X	X	X	X	X	X	X	X
		S	S	S	S	S	S	S	S	S	S
		Z	Z	Z	Z	Z	Z	Z	Z	Z	Z
'I' = No-insurance only		O	O	O	O	O	O	O	O	O	O
'C' = CA Schedule Violation		R ^a		I ^a		C					
'R' = 3008(h)-like release		B ^a		B ^a		B					
^a = Class I only											

8a. Viol. Comment: _____

9. ENFORCEMENT ACTIONS:

Area of Class	Type (use code)	Date Action Taken	Compliance Dates Scheduled	Actual	Penalty Assessed	Collected	Resp. Ag. (use code)

Codes for Types of Enforcement Actions:

03 = Warning Letter
04 = Admin. Complaint
05 = Final Admin. Order
10 = Informal

11 = Filed Civil Action
12 = Filed Criminal Action
18 = Civil Referral to AG/DOJ
19 = Final Judicial Order

15 = CA Init. Admin. Order
16 = CA Final Admin. Order

Resp. Agcy Codes
E = EPA
S = State
X = EPA Oversight

10. Enforc. Comment: _____

INSTRUCTIONS
FY 1988 RCRA COMPLIANCE
MONITORING AND ENFORCEMENT LOG

BLOCK

DIRECTIONS

1. EPA ID #: Enter the Handler's EPA ID number.
2. HANDLER NAME: Enter the Handler's Name.
3. ADDRESS: Enter the Handler's Address (street, city, state)
4. DATA ENTRY TYPE: Check 'NEW' if new initial evaluation is being reported; check 'UPDATE' if a subsequent evaluation, or violation or enforcement data is being provided.

5. DATE OF INITIAL EVALUATION: Enter the DATE the Initial Evaluation started. This date is essential to enter information into and retrieve it from HWDMS. The date of the initial evaluation must be included on the form when reporting a Compliance Schedule Evaluation, an enforcement action, or any subsequent information related to the initial evaluation conducted on the date in Block 5.

The DATE entered should be the date the evaluation actually began. For inspections it is the date the inspection of the handler actually started onsite; for record reviews it should reflect the date the review, which included a particular document, began.

EXCEPTION: When conducting a "record review" of a Part B, the evaluation date should be the end date of the review, since these evaluations are typically lengthy.

5a. RESPONSIBLE
AGENCY

Write the appropriate code in the box to indicate whether the evaluation was conducted by the State, by EPA (EPA-lead ((Code E)) or oversight ((Code X)), or by a State or EPA contractor. Any evaluation conducted by EPA for oversight purposes, i.e. to evaluate the quality of a State's compliance and enforcement program, is considered

PY 1988 FACILITY STATUS SHEET

1.a. EPA ID: PA100000000000000000

2.a. Date Status Sheet Submitted / /

b. Facility Name: Ford-Alka Park Claymore LF

b. First Time Report ☒ Update ☐

This form only applies to facilities that have some form of land disposal. Of these facilities, complete this form for only those facilities that are not on a permit track for their land disposal.

3. Facility Ground Water
Monitoring Status
(Choose one)

D = 265 Detection H = GWH Not Required
A = 265 Assessment X = No wells but should have
U = Waiver (Hydrogeologic)

4. GWH Activity Reported with this Submission	Respon.	Date	Compliance	Compliance	Compliance	Hazardous Waste
(More than one Activity can be reported on a single Status Sheet)	Agency	Compliance	Status	Date	Constituent	
	E=EPA	Status	Y=Compliance	Report	(HUC) Flag	
	S=State	Determined	N=Non-Compl.	Submitted	Y=HUC in GW	
			U=Under Review		N=No HUC in GW	
01 Evaluation of Installation of Well System				XXXXXXXXXX	XXXXXXXXXXXXXXXXXX	
02 Evaluation of Sampling, Analysis and Evaluation Program				XXXXXXXXXX	XXXXXXXXXXXXXXXXXX	
03 Notice of Significant Increase in Concentrations				XXXXXXXXXX	XXXXXXXXXXXXXXXXXX	
04 Groundwater Quality Assessment Report				XXXXXXXXXX	XXXXXXXXXXXXXXXXXX	
05 Waiver Demonstration	S	9/28/88	Y	XXXXXXXXXX	XXXXXXXXXXXXXXXXXX	
06 GWH Records				XXXXXXXXXX	XXXXXXXXXXXXXXXXXX	
07 Evaluation of Hydrogeologic Information				XXXXXXXXXX	XXXXXXXXXXXXXXXXXX	

GWH Comment: _____

5. Financial Requirements	Respon.	Date	Compliance Status	Compliance Status
	Agency	Determined or:	Y= Compliance	
		N = Not Evaluated	N= Non-Compliance	
		X = Not Applicable	B= Bankruptcy	
C = Closure Assurance				
L = Post Closure Assurance				
S = Sudden Liability Instrument				
N = Non-Sudden Liability Instrument				
R = Corrective Action Assurance Instrument				

Financial Comment: _____

